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April 11, 2022

BY CM/ECF

Honorable Robert W. Lehrburger United States Magistrate Judge United States Courthouse 500 Pearl Street New York, New York 10007-1312

> Arias v. Comm'r of Soc. Sec. Re:

> > 1:21-cy-03118-RWL

Dear Judge Lehrburger:

This Office represents Defendant in the above-referenced action. We write respectfully to request a 30-day extension of time for Defendant to file her Cross-Motion for Judgment on the Pleadings and Response to Plaintiff's Motion for Judgment on the Pleadings, currently due on April 18, 2022, to May 18, 2022. The reason for the request is that the Regional Counsel's Office is currently experiencing very heavy workload constraints, and more time is needed to review the record and prepare the Commissioner's response. This 30-day extension of time will allow the undersigned to have sufficient time to review the record and respond to Plaintiff's motion. This is Defendant's first request for an extension of time to file her cross-motion in this case. Plaintiff's counsel, Christopher Bowes, has graciously consented to the Defendant's extension request.

In the event that this motion is granted, Plaintiff's reply brief, which was originally due on April 27, 2022, will be due on May 27, 2022.

We thank this Court for its time and consideration.

Respectfully,

DAMIAN WILLIAMS United States Attorney

By: <u>s/Maria Fragassi Santangelo</u>

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cc: Christopher Bowes, Esq. Via CM/ECF

SO ORDERED:

4/11/2022

HON. ROBERT W. LEHRBURGER UNITED STATES MAGISTRATE JUDGE